

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

TATUNG CO.;  
TATUNG COMPANY OF AMERICA, INC.; AND  
VIEWSONIC CORPORATION

Defendants.

Civil Action No. 04-343 (JJF)

**EXHIBIT E**

**FILED UNDER SEAL**

**DECLARATION OF MANUEL NELSON IN SUPPORT OF  
VIEWSONIC'S MOTION TO COMPEL  
LPL re REQUEST FOR PRODUCTION 128  
SUBMITTED TO SPECIAL MASTER POPPITI ON MAY 2, 2007**

I, Manuel Nelson, declare as follows:

1. I make this declaration from personal knowledge, and information that I believe to be true and, if called upon, could competently testify to matters stated herein.
2. I am employed by Connolly Bove Lodge & Hutz LLP, the law firm representing Defendant ViewSonic Corporation ("ViewSonic").
3. Enclosed as Exhibit A are copies of photographs of an IBM LCD module part no. 21L6550, Serial No. 839943. This module has four screws inserted into the back of the module (see red arrows added to VS113849 and VS113850). Upon information and belief, this module appears to have been manufactured in 1998 (see VS113858). VS113852 shows screws holes on the side of module.
4. Enclosed as Exhibits B-D are letters addressing the bill of material information LPL produced on January 22, 2007 for LPL products made or sold between 1997-1998.
5. Enclosed as Exhibit E is the bill of material information produced by LPL (bates numbered LPL09463 to LPL09762, hereinafter "BOM") referenced in Exhibits B-D, which is designated **Highly Sensitive Confidential**.

6. Enclosed as Exhibit F is a copy of an LPL Product Specification for LCD module model no. LM151X1 that ViewSonic independently obtained. This model is identified in the BOM LPL produced (LPL09494). On page 5 of 6 of this Exhibit, there is a figure of the back of the LCD module that appears to show mounting holes near the corners of the device. This figure also shows what appear to be holes on the rear surface of the device that, upon information and belief, may be screw holes. This model is not identified in Exhibit 23 enclosed with ViewSonic's motion.

7. Enclosed as Exhibit G is a copy of an LPL Product Specification for LCD module model no. LM151X2 that ViewSonic independently obtained. This model is identified in the BOM LPL produced (LPL09505). On page 20 of this Exhibit is an instruction that the module must be mounted using holes in the corners. On page 22 of this Exhibit, there is a figure of the back of the LCD module that appears to show mounting holes near the corners of the device. This figure also shows what appear to be holes on the rear surface of the device that, upon information and belief, may be screw holes. This model is not identified in Exhibit 23 enclosed with ViewSonic's motion.

8. Enclosed as Exhibit H is a copy of an LPL Product Specification for LCD module model no. LM151X2-C2TH that ViewSonic independently obtained. This model is identified in the BOM LPL produced (LPL09516). On page 19 of this Exhibit is an instruction that the module must be mounted using holes in the corners. On page 21 of this Exhibit, there is a figure of the back of the LCD module that appears to show mounting holes near the corners of the device. This figure also shows what appear to be holes on the rear surface of the device that, upon information and belief, may be screw holes. This model is not identified in Exhibit 23 enclosed with ViewSonic's motion.

9. Enclosed as Exhibit I is a copy of an LPL Product Specification for LCD module model no. LP064V1 that ViewSonic independently obtained. This model is identified in the BOM LPL produced (LPL09526). On page 18 of this Exhibit is an instruction that the module must be mounted using holes in the corners. On page 14 of this Exhibit, there is a figure of the

back of the LCD module that appears to show mounting holes near the corners of the device. This figure also shows what appear to be holes on the rear surface of the device that, upon information and belief, may be screw holes. This model is not identified in Exhibit 23 enclosed with ViewSonic's motion.

10. Enclosed as Exhibit J is a copy of an LPL Product Specification for LCD module model no. LP121S4 that ViewSonic independently obtained. This model is identified in the BOM LPL produced (LPL09596). On page 4 of this Exhibit are figures that show the side edges of the module that appear to show mounting holes near the corners of the device. On page 5 of this Exhibit, there is a figure of the back of the LCD module that shows what appear to be holes on the rear surface of the device that, upon information and belief, may be screw holes. This model is not identified in Exhibit 23 enclosed with ViewSonic's motion.

11. Enclosed as Exhibit K is a copy of an LPL Product Specification for LCD module model no. LP141X3 that ViewSonic independently obtained. This model is identified in the BOM LPL produced (LPL09709). On page 15 of this Exhibit is an instruction that the module must be mounted using holes in the corners. On page 15 of this Exhibit, there is a figure of the back of the LCD module that shows what appear to be holes on the rear surface of the device that, upon information and belief, may be screw holes. This model is not identified in Exhibit 23 enclosed with ViewSonic's motion.

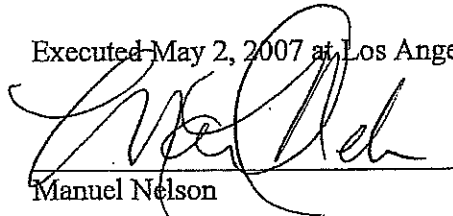
12. Enclosed as Exhibit L is a copy of an LPL Product Specification for LCD module model no. LP150X1 that ViewSonic independently obtained. This model is identified in the BOM LPL produced (LPL09738). On page 17 of this Exhibit is an instruction that the module must be mounted using holes in the corners. On page 14 of this Exhibit, there is a figure of the back of the LCD module that shows what appear to be holes on the rear surface of the device that, upon information and belief, may be screw holes. This model is not identified in Exhibit 23 enclosed with ViewSonic's motion.

13. Enclosed as Exhibit M is a copy of an LPL Product Specification for LCD module model no. LC064N1 dated February 15, 1998 that ViewSonic independently obtained. This

model is identified in the BOM LPL produced (LPL09467). On page 17 of 17 of this Exhibit, there are figures of the LCD module that appear to show mounting holes near the corners of the device. The figure in the lower left is not sufficiently clear to determine whether there are holes on the back surface of the device.

14. Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed May 2, 2007 at Los Angeles, California.



Manuel Nelson

**CERTIFICATE OF SERVICE**

I hereby certify that on May 2, 2007, a true copy of the foregoing document was hand delivered to the following persons and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing to the following and the document is available for viewing and downloading from CM/ECF:

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I hereby certify that on May 2, 2007, I have sent by email the foregoing document to the following non-registered participants:

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